



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Frederick Wolf, DBA, Legacy Site Services for Arkema**

March 6, 2015

Kristine Koch  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, WA 98101-3140

**Re: EPA Draft Feasibility Study, Section 2 (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Dear Kristine:

The Lower Willamette Group ("LWG") appreciates your transmittal of EPA's proposed draft Section 2 for the draft Feasibility Study ("FS"). Your email dated February 23, 2015, stated that the LWG has 30 days to review the draft and provide comments to EPA.

We note that Tables 2.2-1, 2.2-4, 2.2-5, 2.2-8, and 2.2-9 include a background value of 6 parts per billion for total PCBs based on EPA's value from Section 7 of the revised draft Remedial Investigation ("RI"). As you know, the LWG disputed EPA's use of that value for determining background and we are waiting for Rick Albright to issue his decision on the dispute. We do not know when he will do so. By this letter we are providing notice that when we receive his decision, the LWG will need a reasonable opportunity to review and comment on how his decision should be incorporated in the draft FS section 2.

We believe such a review is consistent with the letter and intent of the FS review process dated December 15, 2014. The LWG anticipated that EPA would provide full and complete draft versions of each section of the FS. The background value for total PCBs is a critical element of Section 2 and the LWG expects to be provided sufficient opportunity to review and comment on how that value is established and incorporated in the draft FS.

Please let us know if you would like to discuss this letter further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Wyatt", is written over a light blue horizontal line.

Bob Wyatt

cc:

Sean Sheldrake, U.S. Environmental Protection Agency, Region 10  
Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Grand Ronde Community of Oregon  
Confederated Tribes of Siletz Indians of Oregon  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Nez Perce Tribe  
Oregon Department of Fish & Wildlife  
United States Fish & Wildlife  
Oregon Department of Environmental Quality  
LWG Legal  
LWG Repository